

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE: ) Chapter 11  
 )  
EASTERN LIVESTOCK CO., LLC, et al., ) Case No. 10-93904-BHL-11  
 )  
Debtors. )  
 )  
FRIONA INDUSTRIES, L.P., )  
 )  
Plaintiff, )  
 )  
v. ) Adversary Proceeding No. 11-59093  
 )  
EASTERN LIVESTOCK CO., LLC, et al., )  
 )  
Defendants. )  
 )  
and )  
 )  
CACTUS GROWERS, INC., )  
 )  
Intervenor, )  
 )  
v. )  
 )  
EASTERN LIVESTOCK CO., LLC, et al., )  
 )  
and )  
 )  
J & F OKLAHOMA HOLDINGS, INC., )  
 )  
Intervenor, )  
 )  
v. )  
 )  
EASTERN LIVESTOCK CO., LLC, et al., )  
 )  
Defendants. )

**TRUSTEE'S RULE 30(b)(6) NOTICE OF DEPOSITION TO  
PIEDMONT LIVESTOCK COMPANY, INC.**

Please take notice that, pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030, James A. Knauer (the "Trustee"), as the trustee of Eastern Livestock Co., LLC ("ELC"), by counsel, will take the deposition of Piedmont Livestock Company, Inc. beginning at 9:00 a.m. EDT on September 6, 2013 at the offices of DelCotto Law Group, PLLC, 200 North Upper Street, Lexington, Kentucky 40507 before a court reporter authorized to administer oaths. The deposition will be conducted in accordance with the July 3, 2012 *Order Establishing Deposition Protocols* [Main Case, Docket No. 1229]. You are invited to appear and take part in such examination.

### **Definitions**

Definitions applicable to this Notice of Deposition include the following:

1. You," "your," and "Piedmont" means and refers to Piedmont Livestock Company, Inc., and includes all persons and organizations under your control, including but not limited to your parents, subsidiaries, affiliates, officers, directors, employees, attorneys, accountants, agents, and representatives of any kind.
2. "ELC" or "Eastern" means and refers to Eastern Livestock Co., LLC, and includes its affiliates, members, officers, employees, attorneys, agents, accountants, and representatives of any kind.
3. "Trustee" means and refers to James A. Knauer, as the duly appointed Chapter 11 trustee for Eastern Livestock Co., LLC, and includes his attorneys, agents, and representatives of any kind.
4. "Cattle" means and refers to the cattle identified as "J&F Cattle" in Piedmont Livestock Company, Inc.'s First Amended Answer to J&F Oklahoma Holding, Inc.'s First

Amended Intervention and Complaint in the Nature of Interpleader, Counterclaims, and Cross-Claims filed as Docket No. 146 in the above-captioned adversary proceeding.

**Subjects of Examination**

Examination is requested on any and all knowledge possessed by or reasonably available to Moseley relating to the following matters:

1. Any agreement, oral or written, relating to or concerning any of the Cattle.
2. The purchase and sale of any of the Cattle to any person or entity.
3. Any payment that Piedmont made or received for any of the Cattle.
4. Piedmont's business dealings with ELC during 2009 and 2010.
5. Piedmont's business dealings with J&F Oklahoma Holdings, Inc. or any related entity during 2009 and 2010.
6. Any conversations that any representative of Piedmont had with anyone concerning payment for any of the Cattle.
7. Any conversations that any representative of Piedmont had with anyone concerning any of the Cattle.
8. All purchase orders, invoices, shipping records, trucking records or other records that relate to any of the Cattle.

FAEGRE BAKER DANIELS LLP

By: /s/ Dustin R. DeNeal

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*Counsel for James A. Knauer, Chapter 11 Trustee*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2013, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that on August 22, 2013, a copy of the foregoing pleading was mailed by first-class U.S. Mail, postage prepaid and properly addressed, to the following:

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I further certify that on August 22, 2013, a copy of the foregoing was served via email on the following counsel of record:

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